RENE L. VALLADARES
Federal Public Defender
State Bar No. 11479
JOY CHEN
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Joy Chen@fd.org

Attorney for Eric Tyrone Jackson

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC TYRONE JACKSON,

Defendant.

Case No. 2:11-cr-00442-GMN-GWF-1

STIPULATION TO VACATE STATUS CONFERENCE AND LIFT STAY OF RELEASE ORDER (First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen, Assistant Federal Public Defender, counsel for Eric Tyrone Jackson, that the status conference currently scheduled on February 27, 2024, be vacated and the stay of Mr. Jackson's release order be lifted.

This Stipulation is entered into for the following reasons:

1. On February 23, 2024, US Probation Officer Landon VanWormer informed undersigned defense counsel that the District of Kansas has accepted courtesy supervision over Mr. Jackson. *See* Ex. A. If Mr. Jackson performs well after 180 days, it is the intention of the District of Kansas to accept jurisdiction of his case.

- 2. Officer VanWormer is in communication with Mr. Jackson's case manager at USP Marianna regarding the logistics of his travel from Florida to Kansas. He reports that once the stay of this Court's release order is lifted, he will be released from the BOP facility and will likely be put on a plane to Kansas. Officer VanWormer is also working with the case manager to ensure that Mr. Jackson is released to Kansas with his medications.
- 3. For these reasons, the parties respectfully request that this Court vacate the status hearing scheduled for February 27, 2024, and to lift the stay of the Court's release order on that date as well.

This is the first request filed herein.

DATED this 23rd day of February, 2024.

RENE L. VALLADARES Federal Public Defender JASON M. FRIERSON United States Attorney

By <u>/s/ Joy Chen</u>
JOY CHEN
Assistant Federal Public Defender

By /s/ Jim W. Fang
JIM W. FANG
Assistant United States Attorney

### 

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	Case No. 2:11-cr-00442-GMN-GWF-1
Plaintiff,	<u>ORDER</u>
v.	
ERIC TYRONE JACKSON,	
Defendant.	

IT IS THEREFORE ORDERED that the status conference currently scheduled for Tuesday, February 27, 2024 at 2:00 p.m., be vacated, and the stay of Mr. Jackson's release order be lifted.

DATED this 23 day of February, 2024.

UNITED STATES DISTRICT JUDGE

# EXHIBIT A

### UNITED STATES PROBATION AND PRETRIAL SERVICES OFFICE DISTRICT OF KANSAS

#### J. SCOTT JONES CHIEF PROBATION OFFICER

401 North Market, 3rd Floor Wichita, Kansas 67202-2011 316-315-4400 Toll Free: 888-224-1458 Fax: 316-315-4401 / 4402

## MILTON W. RUBLE DEPUTY CHIEF PROBATION OFFICER Kansas City Division

MELISSA L. GOLDSMITH
ASSISTANT DEPUTY CHIEF PROBATION OFFICER
Kansas City Division



#### **REPLY TO:**

500 STATE AVENUE, M 35 KANSAS CITY, KANSAS 66101-2431 913-735-2400 Toll Free: 888-224-2545 Fax: 913-735-2402

February 23, 2024

Landon VanWormer Senior U.S. Probation Officer U.S. Probation Office District of Nevada

> RE: Jackson, Eric Case No.: 2:11CR442 **Approved release plan**

Dear Officer VanWormer,

On February 8, 2024, the request for a prerelease investigation was received by this office regarding the above-named person. On February 21, 2024, contact was made with Connie Slaughter at the residence located at 2742 N. 87<sup>th</sup> Street, Kansas City, KS 66101 to determine if this address would be an appropriate release plan. At that time the determination was made this appears to be a suitable residence for the offender; therefore, we are approving this proposed release plan and accepting courtesy supervision.

If you should have any questions, or require additional information, please do not hesitate to contact me at (913) 735-2420.

Sincerely,

Jovanny Hernandez US Probation Officer